DOCUMENT RESUME

ED 218 842 EC 143 103

AUTHOR Brightman, Mikel F.; Archer, Edith L.
TITLE Three Evaluative Research Studies on Compliance with P.L. 94-142 within the Context of Present Economic Realities.
PUB DATE 19 Mar 82
NOTE 36p.; Paper presented at the Annual Meeting of the American Educational Research Association (New York, NY, March 19-23, 1982).

EDRS PRICE MF01/PC02 Plus Postage.
DESCRIPTORS *Compliance (Legal); Decision Making; Delivery Systems; *Disabilities; Elementary Secondary Education; *Federal Legislation; *Individualized Education Programs; *Referral; *Student Evaluation; Urban Schools
IDENTIFIERS *Education for All Handicapped Children Act

ABSTRACT

Three studies were conducted in a large urban school district to determine how well the requirements of P.L. 94-142 (the Education for All Handicapped Children Act) are being met. Questions regarding the referral process addressed the procedures of the referral committee. The appraisal process was evaluated in terms of characteristics of children referred, the frequency and types of evaluation, and elapsed time between various stages in the referral/evaluation process. Finally, the individualized education program (IEP) was looked at to determine whether the components of the IEP were completed as required. Among findings were that the time between date of parental contact and the date of the referral committee meeting when the written recommendation was made averaged 47 days; there was lack of consistently recorded data on the appraisal process; and a significant amount of legally required information was missing from the IEPs. Tables with statistical data are included, and sample forms are appended. (SB)

****
* Reproductions supplied by EDRS are the best that can be made *
* from the original document. *
****

ED218842

U.S. DEPARTMENT OF EDUCATION
NATIONAL INSTITUTE OF EDUCATION
EDUCATIONAL RESOURCES INFORMATION
CENTER (ERIC)

This document has been reproduced as received from the person or organization originating it.
Minor changes have been made to improve reproduction quality.

• Points of view or opinions stated in this document do not necessarily represent official NIE position or policy.

Three Evaluative Research Studies on Compliance with P. L. 94-142 within the Context of Present Economic Realities

Mikel F. Brightman
Edith L. Archer

Houston Independent School District

"PERMISSION TO REPRODUCE THIS MATERIAL HAS BEEN GRANTED BY

Edith L. Archer

TO THE EDUCATIONAL RESOURCES INFORMATION CENTER (ERIC)."

Paper presented at the annual meeting of the American Educational Research Association, New York City, New York, March 19, 1982

EC143103

INTRODUCTION

During the past six years, state and local special education policies and procedures have been concentrated on the implementation of the Education for all Handicapped Children Act (PL 94-142). State and local education agencies have made interpretations to suggest or to mandate how the law can best be implemented and how handicapped children can best be served. Despite these interpretations, there are many regulations in PL 94-142 that are still ambiguous and that are subject to local interpretation because they have not been clarified at the federal level (Sabatino, 1981).

Though not all of the guidelines are clear, school districts have reorganized special education programs, retrained personnel, hired additional personnel, formalized systems of locating unserved handicapped children, referred misserved handicapped students for other types of educational services, refined student appraisal services, and markedly structured the Admission, Referral and Dismissal (ARD) meetings and Individual Education Program (IEP). Massive efforts and a vast amount of money have been required to make these changes in order to implement PL 94-142 at the local level (Boston, 1977; Office of Education, 1978). The degree of compliance with the law has become a measure of the degree to which handicapped children are being appropriately educated. Documentation of compliance has therefore been the primary concern of evaluators of special education programs.

Compliance in a school district generally implies that the system is following regulations; however, PL 94-142 is complex and its guidelines can be interpreted in a number of different ways. Because of this, "compliance" has not been considered operationally defined and is difficult to employ in a standard manner by evaluators charged with measuring the degree to which handicapped children are being served.

In addition to the legislative demands of implementation that have followed the enactment of PL 94-142, reduced federal financial support looms for the 1982-83 school year. State funds for special education services have been tied to the PL 94-142 state plan and local funds have come through the state via the local education agency's PL 94-142 application. With educational costs soaring and competition for resources increasing, any change in funding will require major policy decisions by special educators (Ballard and Zettel, 1978; Sabatino, 1981). It becomes important for administrators to know the level of implementation of PL 94-142 in their districts and the degree to which policies and procedures are being followed. The aspects of the educational program that contribute to implementation and those that do not become meaningful in the face of a changing economic picture.

LOCAL EDUCATION AGENCY COMPLIANCE EVALUATION

In a large urban school district, the initiation of special education evaluation was one of many responses to the passage of PL 94-142. Administrators needed a systematic way to document local implementation of the law and to identify problem areas in implementation. The initial evaluation efforts were small but have grown substantially in the last four years. They included monitoring federally funded programs and reporting to the funding agency, establishing recordkeeping systems for staff development, and evaluating curriculum changes and material. The documentation of the implementation of various components of PL 94-142 has been one of the main functions of special education evaluators in this district. This evaluation has three phases. The first included improving methods of recordkeeping and identifying the services that were being delivered.

The second phase, currently in progress, includes determining how well and to what degree the requirements of PL 94-142 are being met. Phase three will be a logical outgrowth of the preceeding phases and will focus on the quality of educational programs and the degree to which there is student growth and change in these programs (Office of Education, 1978).

The following three evaluation studies of the three stage special education program (referral, appraisal and ARD/IEP processes) were undertaken as part of the phase two evaluation to provide the director of special education with an estimate of the degree to which these three processes were being implemented according to local, state and federal policy. Compliance, being undefined, could not be used as a standard. The degree to which the three stages of the special education program were being implemented, and identification of the implementation problems were the focus of the studies.

EVALUATION OF THE REFERRAL PROCESS, 1981

Data for evaluating the referral process were obtained by school audits and by questionnaires sent to building principals, referral committee chairpersons, and referral committee members.

The state folders of 214 students were randomly selected for audit to determine whether a referral form existed in each folder. A second audit of 82 referral forms was conducted to determine the average amount of time between the date of parent contact and the date of the referral committee meeting. The date of parent contact was used as an indication of when the referring teacher submitted the referral form. These data were collected to determine if referrals were being processed in the schools within the timeline established by the state education agency. The sample was not random, but was balanced according to ethnic ratios in the district.

Building principal and referral committee chairperson questionnaires were sent to each of the 270 schools in the district. Ninety-nine building principals (37%) and 184 referral committee chairpersons (68%) returned the completed forms. Referral committee members were randomly sampled to detemine the 135 that would receive a questionnaire. Ninety-seven (72%) were returned. The three questionnaires were open-ended and were designed to determine consistency across the district with guidelines established by the state education agency for the referral process.

Evaluation questions based on state guidelines are underlined below, followed by the evaluative information regarding each.

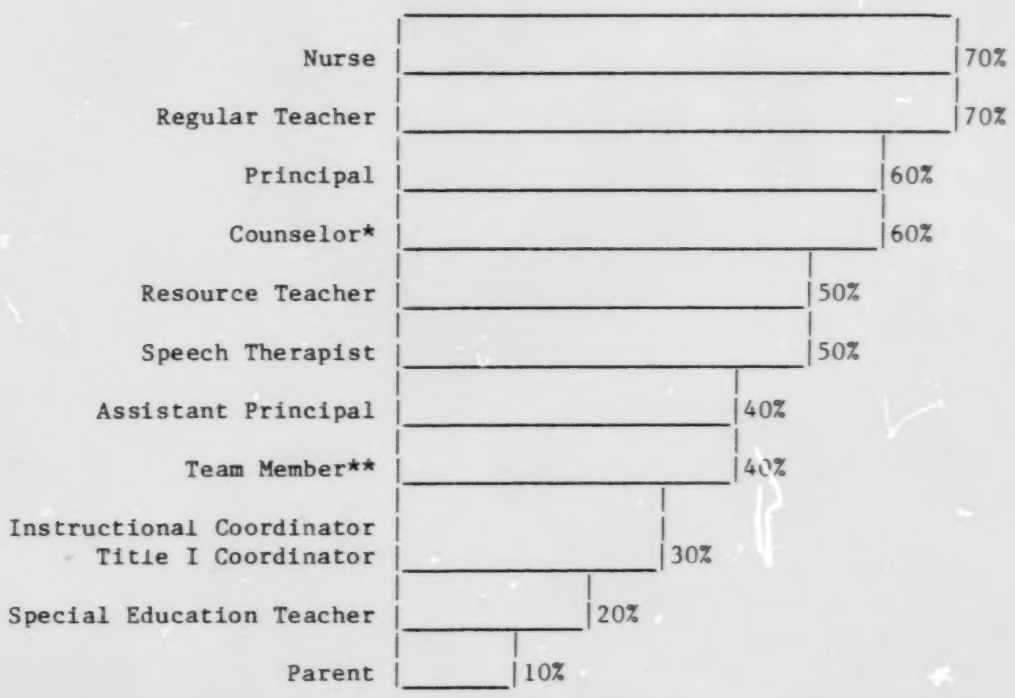
1. Was a referral committee established on each campus under the direction of the principal to implement the referral process?

Data from the principal, referral committee chairperson, and referral committee member questionnaires were analyzed simultaneously to determine compliance with policy and to determine areas in which reported data were in agreement across all three groups.

All schools responding to the questionnaire had a referral committee. Graph 1 shows the percent of schools having specific staff members on their referral committee. Asterisks indicate data that did not agree across the three questioned groups.

Graph 1

Percent of schools having specific personnel on referral committees



*Percent indicated was obtained from principal and committee member questionnaire; chairperson questionnaire showed 88% of schools having counselors on referral committee.

**Percent indicated was obtained from principal and committee member questionnaire; chairperson questionnaire showed fewer than 10% of the schools having special education team members on their referral committee.

2. Was an educational liaison assigned to each child referred? Did this person contact parents about the possible need for alternative programming and gather information about the child to be presented to the referral committee?

All schools responding to the questionnaire indicated that educational liaisons were assigned to referred students. Seventy-six percent (76%) of these liaisons were classroom teachers. Table 1 shows the responses of each group when questioned about the duties of the educational liaison. The data indicated that the duties of the educational liaison were not fully understood by staff members involved in the referral process.

Table 1
Percent of responses indicating knowledge of educational liaison duties

	EDUCATIONAL LIAISON DUTIES			
	CONTACT PARENT	GATHER DATA	OTHER RESPONSE	NO RESPONSE
Principal Questionnaire	59%	78%	29%	0
Chairperson Questionnaire	74%	86%	19%	0
Member Questionnaire	76%	91%	18%	2%

3. Did the referral committee meet, review information, and make a recommendation for possible alternative educational placement or referral to special education?

Table 2 gives principal, chairperson, and referral committee member responses concerning the method of processing referrals. Data indicated that not all schools followed the referral process procedures.

Table 2
Percent of responses indicating method of processing referrals

	STEPS IN PROCESSING REFERRALS			
	COMMITTEE MEETS	INFORMATION REVIEWED	RECOMMENDATION MADE	OTHER
Principal Questionnaire	84%	82%	83%	18%
Chairperson Questionnaire	72%	55%	56%	29%
Member Questionnaire	86%	82%	78%	20%

4. Did more than 20 school days elapse between the initial identification of the child and the time of the written referral committee decision?

An analysis of the data collected during the second audit of 82 referral forms showed that the time between date of parent contact, an indication of when the referral was written, and the date of the referral committee meeting, when the written recommendation was made, averaged 47 days. Though the sample was small and not random, the data indicated that on the average referral forms were probably not being processed within the 20 day time limit. This question was difficult to answer because of the variety of interpretations regarding the dates when activities were begun or completed.

5. How often did the referral committee meet?

Results of the referral committee members questionnaire indicated that 48% of the committees met "as needed." Twenty-three percent (23%) met two or three times a month, 12% met weekly, and 9% met monthly. The remaining 8% did not respond to the question.

6. Did more than two days elapse between the time of the written referral committee decision and the forwarding of the referral committee report to the appropriate personnel for action?

Referral committee members and chairpersons responded to a question asking when and to whom the written referral was transmitted. Principals were not asked this question. Data reported in Table 3 indicated that the two day time line was not being met in almost 70% of the schools.

Table 3
Percent of responses indicating compliance with
2-day time limit for transmitting referral

WHEN IS COMPLETED REFERRAL TRANSMITTED?	COMMITTEE MEMBERS	CHAIRPERSONS
1-2 days after recommendation	30%	29%
1-3 weeks after recommendation	10%	14%
When parents give permission to test When forms are completed	32%	27%
Other	8%	4%
No response given	20%	26%

7. Were the referral committee reports maintained in the students' permanent record folder housed in the school?

The data collected from the audit of 214 state folders indicated that 82% of the folders contained the referral committee report.

8. Was a child transferring into the district who had been in special education in another school district assigned "visitor" status in an appropriate special education class?

Principals were asked to respond to the question "How are in-coming transfer students from another school district who were in special education served in your school?" Over 70% of all principals returning the questionnaire indicated that the student was enrolled "visitor" status and that their records were requested from the previous school districts. The remaining approximately 30% of the principals assigned incoming students to the resource room. Because of the open-ended nature of the question, these two responses appeared to refer to the same procedure.

9. How were referrals for hospital, homebound and pregnant students handled?

District administrative procedures state that hospital, homebound, or pregnant students' referrals will be handled through the central office by the Assistant Director for Community Services. Principal and committee chairperson responses to the question concerning provision of educational services to these students are given in Table 4. The wide variety of responses indicated that these referrals were handled differently in each school and that this procedure was not well understood.

Table 4
Percent of schools indicating who handles requests for services for hospital, homebound and pregnant students

	ASSISTANT DIRECTOR COMMUNITY SERVICES	SCHOOL NURSE	PARENTS	SPECIAL EDUCATION REFERRAL PROCESS	OTHER
Principal Questionnaire	16%	16%	15%	25%	28%
Chairperson Questionnaire	22%	10%	17%	23%	28%

EVALUATION OF THE APPRAISAL PROCESS

The appraisal process was evaluated by auditing the multi-disciplinary team (MDT) logs of 2740 students referred to special education during October 1980 and February 1981. These two months were chosen for the sample because they were the most unlikely to be affected by holidays. The number of new referrals and reevaluations as well as the number of students contract tested were determined. Data concerning non-English testing and the number and type of evaluations also were obtained. Because the district is large and divided into six administrative areas, the data were analyzed descriptively by area.

The data obtained from the logs were analyzed to determine the amount of time in school days between the referral and MDT I, between MDT I and MDT II, and between MDT II and the ARD. The referral date was interpreted differently in each of the six area offices. The MDT I date was defined as the day the multi-disciplinary team first met to determine the child's evaluation needs. The date the team met a second time to review individual reports and write recommendations was the MDT II date. The ARD date was defined as the date the ARD/IEP committee met on the student's campus to determine eligibility for special education and related services, to write the student's education plan, and to determine the student's placement.

After the time spans were computed, analysis of variance (ANOVA) was used to determine group differences.

Evaluation questions used in the review of the appraisal process are underlined below, followed by the evaluative information collected regarding each.

1. <u>What was the age, sex and race of students referred for evaluation or reevaluation?</u>

Table 5 gives the age of students referred during October 1980 and February 1981 by area. The largest group (41%) were between the ages of six and ten. Date of birth was not reported in the MDT logs for Area I.

Table 6 gives the ethnic breakdown by area of referrals received during the sampling period. Ethnic information was sometimes not given on the logs.

Table 7 gives the gender of students referred during October 1980 and February 1981 by area. There were over twice as many males as females referred.

Table 5
Age of students referred during October 1980 and February 1981 by area
N=2686

	I	II	III	IV	V	VI	Total	%
Age Not Given	325	72	169	6	0	88	660	25%
Ages 2 - 5	0	36	15	19	11	12	93	3%
6 - 10	0	273	170	230	179	234	1086	41%
11-15	0	110	84	142	143	168	647	24%
16-23	0	21	23	72	60	24	200	7%
Total	325	512	461	469	393	526	2686	100%

Table 6
Race of students referred during October 1980 and February 1981 by area
N=2686

	I	II	III	IV	V	VI	Total	%
Race Not Given	0	99	88	3	118	53	361	13%
White	93	168	124	30	21	96	532	20%
Black	166	163	198	401	65	193	1186	44%
Hispanic	65	72	44	2	188	180	551	20%
Asian	0	9	4	0	1	0	14	1%
Other	1	1	3	33	0	4	42	2%
Total	325	512	461	469	393	526	2686	100%

Table 7
Gender of students referred during October 1980 and February 1981 by area
N=2686

	I	II	III	IV	V	VI	Total	%
Sex Not Given	0	0	2	11	0	10	23	1%
Female	100	167	137	155	159	154	872	32%
Male	225	345	322	303	234	362	1791	67%
Total	325	512	461	469	393	526	2686	100%

2. What proportion of the evaluations were new referrals?

Table 8 gives the number and percent of new referrals and reevaluations. Sixty-six percent of the sample were new referrals. Most of the students with no information were in Area III where 106 students (23%) were not identified as new referrals or reevaluations.

Table 8

Number of new referrals and reevaluations
during October 1980 and February 1981
by area

N = 2686

AREA		New	Reevaluations	Information Not Given
I		196	124	5
II		439	70	3
III		337	18	106
IV		260	157	52
V		259	125	9
VI		281	222	23
Total		1772	716	198
%		66%	27%	7%

3. What percent of the referrals were contract tested or received evaluation in non-English, medical, PT, OT, and speech?

Table 9 gives the frequency of evaluations specified in the question and the percent of each type of testing. These evaluations are not routinely done but are requested by the MDT on an individual case basis. There were missing or uninterpretable data in these sections of the MDT logs.

Table 9
Number of evaluations by area
Percents based on
N = 2686

	AREA						
	I	II	III	IV	V	VI	n
Non English Testing	15	24	18	14	32	24	127 5%
Contract Testing	0	9	3	361	78	118	569 21%
Medical Evaluation	5	5	14	54	3	7	88 3%
PT Evaluation	4	3	6	5	2	0	20 1%
OT Evaluation	4	1	2	5	2	1	15 1%
Speech Evaluation	86	116	141	166	86	75	670 25%

4. What was the average number of days from referral date to ARD?

The referral date is interpreted differently in area offices; therefore, the date entered in the referral date space on the MDT logs can not be assumed to mean the same thing across the six areas. In some areas the referral date was interpreted as the date the building referral committee met. In other areas, it was interpreted as the date the referral was received in the area special education office. It was also identified as the date of the first MDT meeting. Because of these various interpretations, it is not possible to determine exactly the number of days from this date to any other point in the process. This information must be considered an approximation. Table 10 shows the number of days from referral to ARD for the district and for each of the areas. Area I is excluded because ARD dates were not kept on their logs.

Table 10

Number of days from referral to ARD

Number of Days from Ref to ARD	District* Freq.	District* Cum. %	II Freq.	II Cum. %	III Freq.	III Cum. %	IV Freq.	IV Cum. %	V Freq.	V Cum. %	VI Freq.	VI Cum. %
0 - 49	467	52%	105	45%	118	52%	32	32%	59	48%	153	72%
50 - 99	354	92%	99	88%	99	96%	55	87%	55	93%	46	94%
100 -149	54	98%	19	96%	10	100%	12	99%	8	100%	5	96%
150 -199	8	99%	5	98%	-	-	-	-	-	-	3	98%
200 and over	11	100%	5	100%	-	-	1	100%	-	-	5	100%
	n = 894		n = 233		n = 227		n = 100		n = 122		n = 212	
	mean = 55		mean = 64		mean = 52		mean = 67		mean = 55		mean = 44	
	mdn = 45		mdn = 57		mdn = 46		mdn = 63		mdn = 52		mdn = 34	

* Excludes Area I

The district cumulative percent column shows that more than half (52%) of the students completed the process from referral date to ARD in less than 50 days. It also shows that 40% of the students required 50-99 days to complete the process. The district median and mean were 47 days and 55 days respectively.

5. What was the average number of days from MDT I date to ARD?

Table 11 presents the area and district data for MDT I to ARD. These dates are for those cases not included in Table 10 because a referral date was not listed on the MDT logs. Area 1 is excluded because no ARD dates were available.

Table 11

Number of days from MDT I to ARD (Referral date = 0)

Number of Days from MDT I to ARD (Ref date = 0)	District* Freq.	District* Cum. %	II Freq.	II Cum. %	III Freq.	III Cum. %	IV Freq.	IV Cum. %	V Freq.	V Cum. %	VI Freq.	VI Cum. %
1 - 30	110	36%	37	54%	18	26%	17	19%	1	33%	37	50%
31 - 60	81	63%	9	68%	40	84%	17	38%	0	33%	15	70%
61 - 90	73	87%	11	84%	10	99%	33	75%	2	100%	17	93%
91 -120	29	97%	4	90%	1	100%	20	98%	-	-	5	100%
121 -150	9	99.7%	6	99%	-	-	2	100%	-	-	-	- %
150 or more	1	100%	1	100%	-	-	-	-	-	-	-	-
	n = 303		n = 68		n = 69		n = 89		n = 3		n = 74	
	mean = 50		mean = 47		mean = 42		mean = 65		mean = 57		mean = 42	
	mdn = 39		mdn = 20		mdn = 38		mdn = 73		mdn = 75		mdn = 31	

* Excludes Area I

6. What was the average number of days from referral to MDT II?

Table 12 presents the area and district data for this time span for those cases without an ARD date listed on the MDT log.

Table 12

Number of days from referral to MDT II (ARD = 0)

Number of Days from Ref to MDT II (ARD=0)	District		I		II		III		IV		V		VI	
	Freq.	Cum. %	Freq.	Cum. %	Freq.	Cum. %	Freq.	Cum. %	Freq.	Cum. %	Freq.	Cum. %	Freq.	Cum. %
1 - 30	310	62%	121	61%	17	35%	11	34%	14	35%	120	80%	27	93%
31 - 60	103	83%	52	87%	8	52%	13	75%	14	70%	14	89%	2	100%
61 - 90	40	91%	17	96%	3	58%	5	91%	3	78%	12	97%	-	-
91 -120	38	99%	7	99%	16	92%	3	100%	8	98%	4	100%	-	-
121 -150	7	100%	1	99.5%	3	98%	-	-	0	98%	-	- %	-	-
150 or more	-	-	1	100%	1	100%	-	-	1	100%	-	-	-	-
	n = 498		n = 199		n = 48		n = 32		n = 40		n = 150		n = 29	
	mean = 35		mean = 33		mean = 66		mean = 44		mean = 53		mean = 25		mean = 20	
	mdn = 26		mdn = 26		mdn = 55		mdn = 35		mdn = 36		mdn = 19		mdn = 20	

District statistics for the three time spans (referral to MDT I, MDT I to MDT II, and MDT II to ARD) are reported in Table 13.

Table 13

District statistics for three time spans
in number of school days

	Mean	Median	Range	# Valid Cases	# Missing Cases
Ref to MDT I	7.1 days	.8 days	0-266 days	1770	916
MDT I to MDT II	29.5 days	21.3 days	0-299 days	1515	1171
MDT II to ARD	17.9 days	14 days	0-134 days	1063	1623

7. Was there a significant difference between groups that were non-English tested and those that were not?

The means for those students who were and were not tested in a language other than English are given in Table 14.

Table 14

Mean numbers of days
for English and non-English tested
students

	N	Mean Ref to MDT I	Mean MDT I to MDT II	Mean MDT II to ARD
English-tested	2368	7.3 days	30 days	17.5 days
Non-English tested	127	7.9 days	30 days	19.4 days
No information on testing given	191	1.8 days	19.1 days	26 days

Statistical tests on non-English testing data indicate three significant differences: (1) the time for those students whose language of testing was not given was significantly shorter than those two groups for which testing information was given for MDT I to MDT II; (2) the time span from MDT II to ARD was significantly longer for a non-English tested student than for an English tested student; and (3) the mean for students where there was no language of

testing information was significantly longer than that for the other two groups from MDT II to ARD. The lack of consistently recorded data on this variable made it difficult to obtain usable information; therefore, it was cautioned that information reported here may not be meaningful.

EVALUATION OF THE ARD/IEP PROCESS, 1981

During the 1978-79 school year, a stratified random sample of 1,317 IEPs was audited to determine whether the components of the IEP (See Appendix A) were completed as required. One of the major findings of the study was that a significant amount of legally required information was missing from the IEPs. Following the study, efforts were made by the school district to standardize the completion of the required components of the IEP. A workshop was held, a handbook was developed, and the IEP form was revised.

In the spring of 1981, 216 IEP documents were audited at school sites to determine the effect of the decisions made following the initial study. Again, the interest was in determining whether components of the IEP were completed as required by local, state, and federal guidelines.

A sample across the eight handicapping conditions was selected for the study. Due to the constraints of the number of personnel implementing the study and the time of the year, the sample was not representative by administrative areas. Table 15 contains the number and percent of students' folders audited according to their handicapping condition.

A data collection instrument was designed to allow the rating of each specific component of the IEP as required by federal, state, and local regulations. The specific components were in three categories: (1) those variables listed on the first page and the last three pages of the ARD/IEP committee report, (2) the deficit areas listed on the first page of the ARD/IEP committee report under Current Educational Functioning, and (3) deficit area indicators given on page(s) 2 of the ARD/IEP committee report. The instrument used in the 1981 audit was the same as that used in the 1979-80 study and allowed the auditor to indicate by code whether or not a specific component of the IEP was correctly completed.

Table 15
Audited sample by handicapping condition

Handicapping Condition	Audited n	Sample %
Visually Handicapped	2	1%
Hearing Impaired	1	1%
Orthopedically Handicapped	20	9%
Other Health Impaired	2	1%
Mentally Retarded	11	5%
Emotionally Disturbed	4	2%
Language/Learning Disabled	114	53%
Speech Handicapped	36	16%
Student did not qualify for special education services	26	12%
TOTAL	216	100%

When information was omitted on the IEP, it was coded as not present. A definition of the variables in component 1 (the variables listed on the first page and last pages of the ARD/IEP committee report) and the data required for the variable to be coded as present follows:

1. Handicapping condition agreement - The handicapping condition on the IEP (page one) agreed with that on the student's data file.

2. Physical abilities - A specific physical ability or disability was indicated that would affect participation in an instructional setting or in P.E.

3. Behavior - A behavior that would affect educational programming was indicated.

4. Vocational skills - Skills that might be prerequisite to participation in vocational education were indicated.

5. Instructional/Related hours - The number of hours for instruction and related services totaled 30 hours or 15 hours if Early Childhood.

6. Instructional/related hours--correct - The instructional and related services matched the deficit areas listed on page one of the IEP.

7. Duration - Anticipated duration of each instructional and related service was indicated.

8. Justification - A narrative justification for each service was listed on the IEP.

9. Parent agreement - Parent agreement with the evaluation, program, and placement was indicated on the IEP.

10. Parent present - Presence of parent at the ARD/IEP meeting was indicated on IEP.

11. Signature - Signature of parent was evident on signature page of IEP.

12. Minutes - Evidence of minutes of the meeting was apparent.

Deficit areas listed on page one of the IEP were coded as present or absent. Also coded as present or absent were deficit area indicators. The following indicators had to be present for each deficit area:

1. Level - The grade or functional level of the deficit area was indicated.

2. Annual program goal - A general educational statement for approximately one school year was present.

3. Objectives - Specific statement(s) of what was to be taught in the deficit area was present.

4. Behavioral objective - All objectives within the goal/deficit area were stated behaviorally, including the learner condition, educational task, and criteria for achievement.

5. Start date - The beginning date of instruction for each objective was present.

6. End date - The anticipated date for learner completion of each objective was present.

7. Person responsible - The title or name of the person responsible for implementing each of the objectives was listed.

An IEP accuracy score was created for each student. This accuracy score was an adjusted summation of the above seven indicators across all deficit areas listed on the IEP and was designed to reflect the accuracy of the prescriptive portion of the IEP. The accuracy score was used in statistical analyses.

Data from the IEP audit were analyzed using frequency analyses, crosstabulations, and independent sample t-tests. Forty-six cases of the audited sample (n=216) were not included in some of the analyses because the IEP was not located, not current, or the student was transferred or ARDed out of special education.

Evaluation questions used in the review of the ARD/IEP process are underlined below, followed by evaluative information collected regarding each.

1. To what degree were the components of the IEP correctly completed?

Table 16 contains frequencies and percentages of the nine variables included on the IEP. The areas completed most often were physical abilities, behavior, vocational skills, instructional/related hours, and minutes. These frequencies show an increase from the 1979 audit in areas completed correctly.

Instructional/related hours-correct, duration and justification of services showed an increase in the number of correctly completed IEPs. In 1979 these areas were correctly completed less than 50% of the time.

Table 16
Frequency and percent of variables present on the IEP

	Handicap. Condition Agree	Physical Abilities	Behavior	Vocational Skills	Instruc./ Related Hours	Instruc. Hours Correct	Duration	Justification	Minutes
Present (n=170)	153 90%	167 98%	167 98%	165 97%	166 98%	149 88%	43 55%	116 68%	159 94%

Table 17 shows the frequency and percent of variables related to parent involvement. Fifty-one percent of the parents attended the ARD/IEP meeting. Seventy-five percent of the parents signed the IEP. Although there was not much difference in meeting attendance when comparing the 1981 audit to the 1979 audit, the percentages of parents who signed the IEP increased from the earlier study.

Parent agreement with the evaluation, program, and placement was 53%-54%. The percentages of agreement in the current study were lower than for the 1979 audit where 98%-99% of the parents agreed with the evaluation, program, and placement as indicated on the IEP.

Table 17
Frequency and percent of parent involvement variables

	Parent Involvement Variables				
	Signature	Parent Present	Agreement Evaluation	Agreement Program	Agreement Placement
Present n=170	128 75%	86 51%	90 53%	91 54%	92 54%

Table 18 presents the frequency and percent of deficit areas and the frequencies and percents of deficit area indicators. The percent of completed goals, objectives, start dates and persons responsible increased considerably from the 1979 audit when the range was 58% to 76% for these indicators. The percent of completed end dates also increased from 35% to 71% between the two audits. The percent of completed deficit areas remained the same (77%) in both audits. The percent of behaviorally stated objectives (not shown on Table 18) increased from 11% to 25% between the audits.

Table 18
Frequency and percent of deficit areas
and deficit area indicators
n=503 deficit areas

	Deficit Area	Level	Goal	Objective	Start Date	End Date	Person Responsible
Present	386 77%	324 64%	447 89%	445 88%	420 83%	358 71%	412 82%
Not Present	117 33%	179 36%	56 11%	58 12%	83 17%	145 29%	91 18%

2. Were the IEPs of students whose parent(s) attended the ARD/IEP meeting more accurate than those of students whose parent(s) did not attend?

For each student, an accuracy score was calculated to represent the accuracy with which the IEP was completed. Students' scores were grouped according to whether the parent signed the IEP and whether the parent was present at the ARD/IEP meeting. A t-test for differences between group means indicated that

there was no significant difference in the accuracy of the IEPs of students whose parent(s) attended the meeting or signed the IEP and those students whose parents did not attend the meeting or did not sign the IEP. Table 19 presents these results.

Table 19

IEP accuracy score analyses for parent present and signature

Group		n	$\bar{X}$ Accuracy Score	Significantly Different?
I.	1. Parent present at ARD/IEP meeting	8[illegible]	.746	No
	2. Parent not present at ARD/IEP meeting	84	.745	
II.	1. Parent signed the IEP	128	.767	No
	2. Parent did not sign the IEP	42	.682	

3. Were the IEPs of students with behaviorally stated objectives more accurate than those whose IEPs did not have behaviorally stated objectives?

Students' accuracy scores were grouped according to whether or not their objectives were behaviorally stated. *t*-tests indicated that those students with behaviorally stated objectives did not have significantly higher IEP accuracy scores than those without behaviorally stated objectives.

CONCLUSIONS

The conclusions and recommendations from these three studies were reported to district administrators and special education program personnel. Several areas of the three stage special education process were also indicated as needing further study, e.g., a more intensive evaluation of the referral process. A primary change in evaluation strategies suggested to the special education administration was that program personnel be trained by the evaluators to audit records of special education students on the school campuses. This suggestion is feasible at this time because the special education staff has become more sophisticated in their knowledge of evaluation. This is the first effort of this magnitude attempted in this district and can be viewed as the initial step in transferring compliance auditing and monitoring responsibilities to the special education personnel. If program personnel participate in compliance audits, the results are less likely to seem as an evaluator's view. Use of program personnel also ensures that compliance guidelines are well understood by those with the responsibility for implementing them. Using evaluators as trainers and managers of compliance data collection allows time for initiation of the third evaluation phase that focuses on the quality of programs and the degree of student progress in these programs.

The information gathered through compliance evaluation studies, though legally required, has not provided a standard for measuring the quality of services delivered to handicapped students. Among the areas requiring study are program success, student achievement, appropriate utilization of personnel, and long range planning. Given proposed reductions in funding, it is apparent that evaluative information in these areas will be needed by special education administrators who must make decisions regarding program consolidation, reductions, and additions.

The following are suggestions for initiating evaluation phase three, judging the quality of the programming in the district. First, there must be clearly stated expectations of students' progress through special education. These expectations should be related directly to the maximum education growth that research indicates should be expected of a student with particular characteristics. When a supportable criterion for student achievement is determined, an estimate of competence can be made based on criterion-referenced instruments or essential learner outcomes.

Standardized achievement tests are a second source of data on the progress of special education students. In order to make use of achievement tests, criteria need to be established for determining which students should be tested. For those students for whom standardized testing is appropriate, a clearly prescribed testing program needs to be designed and included on the student's IEP. The questions that need to be addressed for the student are the need for a specifically adapted test booklet, answer sheet, testing time or space. Interpretive use based on the normative aspects of the particular achievement test need to be determined (Morris and Fitz-Gibbon, 1978; McCarthy, 1980; Page, 1980).

These two measures of student growth outlined above would be the basis for determining the effect of specific programs on student achievements. This would allow special education administrators to make decisions concerning the programs to be maintained and the best allocation of money and personnel.

MB5/lajb

Bibliography

Ballard, J., & Zettel, J.J. The managerical aspects of public law 94-142. Exceptional Children, 1978, 44 (6), 457 - 462.

Boston, Bruce O. Education Policy and the Education for All Handicapped Children Act (P.L. 94-142). A Report of Regional Conferences, January - April, 1977. Washington, D. C.: The George Washington University, 1977.

McCarthy, M. M. Minimum competency testing and handicapped students. Exceptional Children, 1980, 47, 166 - 172.

Morris, L. L. & Fitz-Gibbon, C. T. How to Measure Achievement. Beverly Hills: Sage, 1978.

Page, E. B. Tests and decisions for the handicapped: a guide to evaluation under the new laws. Monograph of Journal of Special Education, 1980, 14 (4).

Sabatino, D. A. Are appropriate educational programs operationally achievable under mandated promises of P. L. 94-142? Journal of Special Education, 1981, 15, 9 - 23.

U. S. Department of Health, Education and Welfare. Progress Toward a Free Appropriate Public Education. An Interim Report to Congress on the Implementation of Public Law 94 - 142: The Education for All Handicapped Children Act. 1978

APPENDIX A

PREPARE ORIGINAL
3 COPIES

HOUSTON INDEPENDENT SCHOOL DISTRICT
SPECIAL EDUCATION DEPARTMENT

06/0280 [illegible]0010

ARD/IEP COMMITTEE REPORT

Page ____ of ____

ORIGINATOR: ARD/IEP COMMITTEE

PURPOSE: To document decisions regarding the child's eligibility and need for Special Education and related services.

NAME _____ ID# _____ SEX: ____M ____F D.O.B. _____ GRADE _____ ETHNIC GROUP _____ SCHOOL _____

ADDRESS _____ PARENT/GUARDIAN _____ PHONE # _____

DATE OF MEETING _____ TYPE OF MEETING _____ INITIAL: _____ ANNUAL REVIEW _____ OTHER _____

"NOTICE TO PARENTS OF SPECIFIC ACTION PROPOSED OR REFUSED," "NOTICE TO PARENTS OF THEIR PROCEDURAL SAFEGUARDS," MAILED BY," _____ DATE ____

WAIVER OF TEN DAY NOTICE OBTAINED, IF APPLICABLE, DATE ____/____/____

REVIEW OF INDIVIDUAL EVALUATION:

DATE OF EVALUATION

Review of individual assessment data indicate the presence of a physical, mental or emotional disability. ( ) YES ( ) NO

If one or more handicapping conditions are indicated, check the one(s) the committee found applicable.

( ) Deaf	( ) Deaf/Blind	( ) Mentally Retarded	( ) Speech Handicapped
( ) Hard of Hearing	( ) Emotionally Disturbed	( ) Learning Disabled	( ) Pregnant
( ) Visually Handicapped	( ) Orthopedically Handicapped	( ) Other Health Impaired	( ) Autistic
			( ) Not Eligible

Review of individual assessment data indicate ( ) the presence, ( ) the absence of a significant educational need

A report of the child's specific learning competencies and recommendations for specific instructional and/or learning strategies and related services has been provided and reviewed by the ARD/IEP committee. ( ) YES ( ) NO

INDIVIDUALIZED EDUCATIONAL PROGRAM:

Current Educational Functioning

List grade level or functional level for each deficit area assessed. Name each area, then list level.

_____

_____

_____

_____

_____

Describe physical abilities/disabilities exhibited which would affect participation in an instructional setting or in P.E.

_____

_____

Describe behaviors demonstrated which would affect educational programming.

_____

_____

_____

List skills demonstrated which may be prerequisite to participation in vocational education. List all vocational assessment instruments administered, (if applicable).

_____

_____

_____

ARD/IEP COMMITTEE REPORT

08/02[illegible] 40.0011

NAME _____ D.O.B. _____ DATE _____ Page ____ of ____

DEFICIT AREA _____ GRADE LEVEL OR FUNCTIONAL LEVEL _____

JUSTIFICATION FOR SERVICE _____

ANTICIPATED DURATION OF SERVICE _____

ANNUAL PROGRAM GOAL	SHORT-TERM INSTRUCTIONAL OBJECTIVE (INCLUDE EVALUATIVE CRITERIA)	START DATE	END DATE	PERSON (S) IMPLEMENTING ACTIVITY	REVIEW DATE AND RESULTS

ARD/IEP COMMITTEE REPORT

06/0280 40.0017

NAME_____ D.O.B. _____ DATE_____

PLACEMENT DECISIONS

GRADE PLACEMENT LEVEL: ( ) 0-3, ( ) PK, ( ) 1, ( ) 2, ( ) 3, ( ) 4, ( ) 5, ( ) 6, ( ) 7, ( ) 8, ( ) 9, ( ) 10, ( ) 11, ( ) 12.

GRADUATION PLAN: ( ) YES, ( ) NO. DATE ___/___/___

INSTRUCTIONAL SERVICES:

( ) Regular Subjects: _____ _____ _____ _____ _____ HRS/WK_____

( ) Itinerant Subjects: _____ _____ _____ _____ _____ HRS/WK_____

( ) Resource Subjects: _____ _____ _____ _____ _____ HRS/WK_____

( ) Self-contained Subjects: _____ _____ _____ _____ _____ HRS/WK_____

( ) Hospital Class Subjects: _____ _____ _____ _____ _____ HRS/WK_____

( ) Homebound Subjects: _____ _____ _____ _____ _____ HRS/WK_____

( ) Regular Voc. Education Subjects: _____ _____ _____ _____ _____ HRS/WK_____

( ) COORDINATED VOCATIONAL ACADEMIC EDUCATION (CVAE) SUBJECTS _____ _____ HRS/WK_____

( ) VOCATIONAL EDUCATION FOR HANDICAPPED (VEH) SUBJECT _____ HRS/WK _____

( ) VOCATIONAL ADJUSTMENT COORDINATION (VAC) SUBJECT _____ HRS/WK

O J T _____ HRS/WK

RELATED SERVICES:

( ) TRANSPORTATION:
( ) WHEEL CHAIR BUS
( ) NON WHEEL CHAIR BUS

( ) ORIENTATION AND MOBILITY HRS/WK _____
( ) COUNSELING HRS/WK _____
( ) SPEECH THERAPY HRS/WK _____

( ) OCCUPATIONAL THERAPY HRS/WK _____
( ) PHYSICAL THERAPY HRS/WK _____
( ) OT/PT COMBINED HRS/(WK)_____(MONTH)_____

JUSTIFICATION: _____

OTHER: Specify _____ HRS/WK _____

_____ HRS/WK _____

SPECIAL CONSIDERATIONS IN DETERMINING APPROPRIATE PLACEMENT

CHECK THOSE AREAS THAT APPLY:

( ) BARRIER FREE BUILDING.
( ) ACCESSIBILITY TO ADAPTIVE EQUIPMENT FOR INSTRUCTION.

DESCRIBE: _____

( ) OTHER _____

CAMPUS / LOCATION _____

ADDITIONAL SERVICES FOR WHICH THE STUDENT IS TO BE REFERRED, IF ANY: _____

ARD/IEP COMMITTEE REPORT

06/02 80 40.0015

NAME _____ D.O.B. _____ DATE _____ Page ___ of _____

It is the opinion of the majority of the voting members of the committee that this child will not be placed in Special Education:

- if the only deficiencies identified are directly attributable to a different cultural life style, or to not having had educational opportunities, or to not having achieved from previous educational experiences,

- on the basis of criteria which were developed solely on the command of the English language (for national origin minority or linguistically different students only).

( ) Agreement ( ) Disagreement--If disagreement, dissenting opinions by staff or parents must be attached.

PARENT AGREEMENT: The Parent ( ) agrees ( ) disagrees with the evaluation.
( ) agrees ( ) disagrees with the program (IEP).
( ) agrees ( ) disagrees with the placement.
( ) The parent was not present at the meeting.

Signature of Parent(s) or Guardian(s):

_____ DATE _____

SIGNATURES OF OTHER VOTING MEMBERS	TITLE	DATE
_____	REPRESENTATIVE — ADMINISTRATION	_____
_____	REPRESENTATIVE — INSTRUCTION	_____
_____	REPRESENTATIVE — APPRAISAL	_____
_____	EDUCATIONAL LIAISON	_____
_____	REPRESENTATIVE VISUALLY HANDICAPPED OR DEAF EDUCATION WHERE APPROPRIATE.	_____
_____	STUDENT, WHERE APPROPRIATE.	_____
_____	_____	_____

SPECIAL EDUCATION STATE AUDIT FOLDER.

NAME _____

D.O.B. _____

DATE _____

LOCATION _____

TIME _____

ARD/IEP COMMITTEE REPORT
RECORD OF MINUTES

ON THE **FIRST** PAGE OF THE MINUTES (1) COMPLETE NAME, D.O.B., DATE, LOCATION, TIME, (2) LIST ALL MEETING PARTICIPANTS BY NAME AND TITLE AND (3) BEGIN THE RECORD OF DELIBERATIONS. ON SUBSEQUENT PAGES OF THE RECORDED DELIBERATIONS COMPLETE NAME, D.O.B. AND DATE ONLY.